

EXHIBIT 37

IN THE UNITED STATES COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL NO. 2804  
OPIATE LITIGATION

Case No. 17-mdl-2804

Judge Dan Aaron Polster

This document relates to:

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al.,  
Case No. 1:18-OP-45132

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Videotaped deposition of
MICHAEL CONNELLY
November 7, 2018
9:05 a.m.

Taken at:
Zashin & Rich
950 Main Avenue
Cleveland, Ohio
Wendy L. Klauss, RPR

1 Q. What are pill cases?

2 A. So prescription -- we call it
3 diversion, so it would either be illegally
4 obtained prescriptions.

5 Q. And how do people illegally obtain
6 prescriptions?

7 A. They can write a fake script, they
8 can steal grandma's prescriptions, they can go
9 to a doctor that is writing prescriptions
10 illegally, they can buy illegal prescriptions
11 from a drug dealer on the corner. There is a
12 very -- there is a variety of ways to obtain
13 them.

14 Q. And does the compliance unit look
15 into all of those things?

16 A. They do, you know, within their
17 limitations, because there is only a couple of
18 them. So if I can explain really quickly, any
19 one of these units, if they would need help,
20 they can ask for help from the general squad.

21 Q. How many people are in the
22 compliance unit?

23 A. Two.

24 Q. Has that changed over time?

25 A. It's either been one or two

1 will focus on the pills. If we can make the
2 best case from the heroin, then we will focus
3 on the heroin.

4 If our source can only focus on one
5 of those two, then we have to go in the
6 direction of the source. So the sources and
7 the cases kind of define themselves.

8 That being said -- it's difficult
9 for me to answer your question. I'm sorry.

10 Q. Well, let me ask you this: In the
11 past five years, how many of your
12 investigations -- in how many of your
13 investigations have the pills been the driver
14 of what you were going after, as opposed to
15 heroin or something else?

16 A. A small percentage. A very small
17 percentage.

18 Q. Where does the fentanyl and the
19 heroin that you are investigating come from?

20 A. The source for most of the heroin
21 and fentanyl that we see in our Greater
22 Cleveland area is Mexico.

23 Q. Any other sources?

24 A. China.

25 Q. Have you come across any fentanyl

1 that was being a diverted prescription fentanyl
2 product, as opposed to the bulk fentanyl coming
3 in from China or Mexico?

4 A. I have not.

5 Q. If you would turn to the next page,
6 it is actually page 4 of the application.
7 Again, I want to actually go to the bottom.
8 There is a -- it talks about Cuyahoga County.
9 Do you see that at the very bottom?

10 A. "Cuyahoga County is a heavily
11 populated county"?

12 Q. Yes.

13 A. Okay.

14 Q. And it says, "We basically have an
15 east side task force and a west side task force
16 that handles issues specific to their areas";
17 do you see that?

18 A. Yes.

19 Q. Is that referring to just to
20 Cuyahoga County, is it referring to your task
21 force?

22 A. There is other task forces that
23 Cleveland does not participate in. So that's
24 what they are talking about.

25 There is an east side suburban task

1 Q. So do you agree with that sentence?

2 A. No.

3 Q. So let's unpack that a little bit,
4 because you certainly agree with the truth of
5 the statement that all of the law enforcement
6 officials responding to the 2017 drug threat
7 survey had that opinion?

8 MS. ZIMMERMANN: Objection to form.
9 Objection. Argumentative. You may answer.

10 A. My question would be, I would like
11 to see the question specifically that was asked
12 to these law enforcement agencies, because
13 that's not my opinion.

14 Q. So what is your opinion with
15 respect to what is the greatest
16 threat -- what's the greatest drug threat to
17 the region?

18 A. Fentanyl.

19 Q. Fentanyl. So would you consider
20 the heroin provided by the Mexican-based drug
21 trafficking organizations to be the second
22 greatest drug threat in the region?

23 A. It's right there, yeah, it's right
24 there, just a step behind the fentanyl.

25 Q. I appreciate that clarification.